

REMARKS/ARGUMENTS

1.) Claim Rejections – 35 U.S.C. §103(a)

The Examiner has maintained his rejection of claims 19-22 and 27-30 as being unpatentable over Larsson in view of Hamalainen; and, claims 23-26 and 31-34 as being unpatentable over Larsson in view of Hamalainen, and further in view of Mannoja. The Applicants, again, traverse the rejections.

Claim 19 recites:

19. A method of positioning a radio transmitter, comprising the steps of:

determining a distance to a receiver of known position according to a parameter reflecting propagation delay time;

determining direction from the receiver to the transmitter from a respective parameter reflecting received signal level in a cell/sector where the transmitter is camping or being served and a signal level in one or more co-sited cells/sectors different from the cell/sector where the transmitter is camping or being served, wherein said direction is determined by forming a respective linear scale ratio of or dB-scale differences between at least one or more neighbor cells/sectors received level and a received level of the cell/sector where the transmitter is camping or being served, the received levels being related to the same site. (emphasis added)

In responding to Applicants previously-submitted arguments, the Examiner merely states that Larsson "disclose [sic] use of a plurality of LMU" and Hamalainen "discloses use of TDOA." The Examiner then reasons that TDOA uses "three or more cells at physically distinct locations by triangulating a mobile's position." (emphasis added). In contrast, however, the method claimed by Applicants relies on a "received signal level in a cell/sector where the transmitter is camping or being served" and "a signal level in one or more co-sited cells/sectors different from the cell/sector where the transmitter is camping or being served." In other words, the Examiner points to the use of cells at "physically distinct locations," while Applicants' claimed invention relies on "co-sited cells/sectors." Therefore, according to the Examiner's own argument, Hamalainen teaches away from the claimed invention.

Furthermore, the Examiner wholly failed to address Applicants' additional argument that they have not *merely* claimed determining *direction* of a received signal by *averaging* the signal *power*, but have claimed determining direction from a receiver to a transmitter "by forming a respective linear scale ratio of or dB-scale differences between at least one or more neighbor cells/sectors received level and a received level of the cell/sector where the transmitter is camping or being served, the received levels being related to the same site." (emphasis added) Therefore, the Examiner has failed to establish a *prima facie* case of obviousness of claim 19 over Larsson in view of Hamalainen.

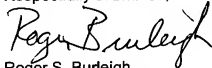
Whereas claim 27 recites limitations analogous to those of claim 19, that claim is also not obvious over Larsson in view of Hamalainen. Furthermore, whereas claims 20-26 and 28-34 are dependent from claims 19 and 27, respectively, and include the limitations thereof, those claims are also not obvious.

CONCLUSION

In view of the foregoing remarks, the Applicants believe all of the claims currently pending in the Application to be in a condition for allowance. The Applicants, therefore, respectfully request that the Examiner withdraw all rejections and issue a Notice of Allowance for claims 19-22 and 27-30.

The Applicants request a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



Roger S. Burleigh
Registration No. 40,542

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Ericsson Inc.
6300 Legacy Drive, M/S EVR 1-C-11
Plano, Texas 75024
(972) 583-5799
roger.burleigh@ericsson.com